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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, et al.

**Plaintiffs.**

v.

GOOGLE LLC.

**Defendant.**

CASE NO. 5:20-cv-03664-LHK-SVK

**DECLARATION OF RICHARD J.  
DEMARCO, JR. IN SUPPORT OF JOINT  
STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR NON-  
PARTY PRICEWATERHOUSECOOPERS  
LLP TO RESPOND TO COURT ORDER  
FOR DOCUMENT PRODUCTION**

*[Filed concurrently with Stipulation and  
[Proposed] Order]*

Referral: Hon. Susan van Keulen, USMJ

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3 I, RICHARD J. DEMARCO, JR. hereby declare:

4 1. I am an attorney in the Office of the General Counsel for Non-Party  
 5 PricewaterhouseCoopers LLP (“PwC”). I make this Declaration in support of PwC’s  
 6 stipulation with Plaintiffs Chasom Brown, et al. (“Plaintiffs”) for an extension of  
 7 time for PwC to respond to the Court’s November 16, 2021 Order Granting in Part  
 8 and Denying in Part Defendant’s Motion for Protective Order (the “Order”), which  
 9 required PwC to produce responsive documents in accordance with the Order by  
 10 November 30, 2021. I have personal knowledge of the matters stated herein, and, if  
 11 called as a witness, I could and would testify competently as to the matters stated  
 12 below.

13 2. On October 7, 2021, Plaintiffs’ counsel served PwC with a subpoena  
 14 seeking multiple categories of documents. On October 20, 2021, PwC served its  
 15 objections to the subpoena, but did not receive a response from Plaintiffs’ counsel.

16 3. On November 17, 2021, I first learned of the Order and, together with  
 17 my colleagues, immediately began identifying the relevant custodians who worked  
 18 on the engagement with Defendant Google and thus may possess e-mails potentially  
 19 responsive to the Order. Between November 22 and 24, 2021, PwC met and  
 20 conferred with Plaintiffs’ counsel, and on November 24, 2021 (the Wednesday  
 21 before Thanksgiving), Plaintiffs’ counsel agreed to an extension to December 10,  
 22 2021 and provided search terms for PwC to use in its search. At my direction, PwC  
 23 has collected and begun processing e-mails of relevant custodians so that search  
 24 terms could be applied, but it will require additional time beyond the current  
 25 November 30, 2021 deadline to complete the processing and to review any e-mails  
 26 that may be generated by the application of search terms. PwC does not yet know  
 27 whether any responsive documents will be located.

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1       4. Given the impending deadline set forth in the Order, as well as the  
2 intervening Thanksgiving holiday, an extension to December 10, 2021 is appropriate  
3 and necessary in order for PwC to complete its search and to produce any  
4 responsive, non-privileged documents that may be located. As noted, Plaintiffs'  
5 counsel has stipulated and agreed to this extension.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

8 Executed on this 29th day of November 2021, in New York, New York.

/s/   
RICHARD J. DEMARCO, JR.

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